

EXHIBIT 121

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STUDENTS FOR FAIR §
ADMISSIONS, INC. §
§
Plaintiff, §
§ CIVIL ACTION NO.
VS. § 1:14-cv-14176-ADB
§
PRESIDENT AND FELLOWS OF §
HARVARD COLLEGE (HARVARD §
CORPORATION) §
§
Defendant. §

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
ORAL AND VIDEOTAPED DEPOSITION OF
RUTH SIMMONS
April 11, 2018
Houston, Texas

REPORTED BY: Linda Russell, CSR
JOB NO: 139807

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2 providing some kind of oversight that would
3 detect whether or not Princeton was tilting too
4 much in one direction.

5 The question of what you could have
6 done about it is a completely different question,
7 because the matter of choice in terms of the --
8 how students elect majors is a very difficult
9 thing to control.

10 MR. CONNOLLY: Mark as Exhibit 7 an
11 article in the Princeton Alumni Weekly entitled,
12 "The Changing Face of West College, An Interview
13 With Fred Hargadon, the New Dean of Admissions."

14 THE WITNESS: Thank you.

15 (Exhibit 7 marked for identification.)

16 Q. (BY MR. CONNOLLY) And this is a
17 lengthy series of question and answers. And in
18 the interest of your time I'll direct you to the
19 question I'd like to -- or the part of the piece
20 I'd like to direct you to. And it's on page 22.

21 MR. ADEGBILE: Do we have a date for
22 this piece? Looks like November 9, 1988?

23 MR. CONNOLLY: That sounds right.

24 MR. ADEGBILE: In the inside -- on
25 the second --

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2 MR. CONNOLLY: Yeah.

3 MR. ADEGBILE: -- second -- bottom of
4 the second page?

5 MR. CONNOLLY: Yeah.

6 Q. (BY MR. CONNOLLY) And the question
7 and answer I'd like you to read is the middle
8 column of page 22 starting at the top and then
9 going to the end.

10 A. Middle column page 22.

11 Q. Starting with the Q at the top --

12 A. Starting with the Q.

13 Q. Yeah.

14 A. "The most successful minority group
15 at the group of colleges you're speaking about
16 are Asian Americans, students who do very, very
17 well but whose success has alarmed some people
18 who worry that they'll take over student bodies.
19 There's even been talk about quotas on Asian
20 Americans at certain schools. What's your
21 feeling about this?"

22 Shall I keep reading? Did you want
23 me to continue?

24 Q. Yes. And you can just familiarize
25 yourself with his answer and then -- you can just

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2 read it internally and then I'll ask you a --

3 A. Oh, internally. Okay.

4 (Witness reviewing document.)

5 A. Okay. Just to the end of that
6 answer?

7 Q. Yeah.

8 A. Okay.

9 Q. And you already read part of the
10 question. In your time spent in universities,
11 have you ever heard the concern that Asian
12 Americans are, quote, taking over student bodies?

13 A. Never. It would be wonderful to have
14 information about the author, about the
15 interviewer, because I can't find anything here
16 that indicates it. But it's -- no, never.

17 Q. Okay. And taking a step back. You
18 said Fred Hargadon is the -- was the --

19 A. Dean.

20 Q. -- Dean of Admissions at Princeton.

21 Can you read the second paragraph of
22 his answer starting with, "You don't have to be."

23 A. "You don't have to be looking for
24 class presidents or captains of teams to realize
25 that a part of the culture in many Asian American

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2 families was not to have the child participate in
3 extracurricular activities" --

4 Do I have to go on?

5 Q. Yes, please. The whole paragraph.

6 A. Okay. -- "but largely to devote
7 himself to and concentrate on academics. There's
8 no doubt that that's an extremely positive
9 feature. It's very cultural. Asian Americans
10 put a very high premium on education and doing
11 well. But in colleges that also put a premium on
12 diversity in terms of energy level outside the
13 classroom, of taking part in activities, that has
14 turned out for many Asian American students to be
15 a handicap. That is, they were not going to show
16 up as well. There are many great exceptions to
17 this, of course."

18 Q. Do you agree with his assessment of
19 Asian Americans?

20 A. I think it's balderdash.

21 Q. Did you ever hear Dean Hargadon
22 express these sort of opinions while you were at
23 Princeton?

24 A. I didn't interact with Fred a lot,
25 but I never heard him express these opinions.

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2 Had I heard him, I would have certainly
3 challenged these notions. But I don't remember
4 his ever saying it in my presence. But we didn't
5 typically meet.

6 Q. In your experience teaching at a --
7 and working at a variety of Ivy League schools,
8 are Asian American students any less personable
9 than other -- than students of other racial
10 groups?

11 A. No.

12 Q. In your experience, do Asian American
13 students tend to participate in fewer
14 extracurricular activities than other students?

15 A. I don't know the data on it, but as
16 a -- I would say generally they are very similar
17 to other students on -- on the campus in their
18 interests.

19 (Exhibit 8 marked for identification.)

20 MR. CONNOLLY: Exhibit 8 is a copy of
21 the Expert Report of Richard Kahlenberg. And as
22 you know, it's very long. I will point you --
23 there's only one to two pages I want you to look
24 at. Page 35, please, of his expert report.

25 A. I don't have it.

1 REPORTER'S CERTIFICATION

2 STATE OF TEXAS)

)

3 COUNTY OF HARRIS)

4 I, LINDA RUSSELL, a Certified Shorthand
5 Reporter within and for the State of Texas, do
6 hereby certify:

7 That the witness whose deposition is
8 hereinbefore set forth, appeared and was duly
9 sworn by me, and that such deposition is a true
10 record of the testimony given by such witness;

11 That a review of the transcript by the
12 deponent was requested;

13 I further certify that I am not related to
14 any of the parties to this action by blood or
15 marriage; and that I am in no way interested in
16 the outcome of this matter.

17 IN WITNESS HEREOF, I have hereunto set my
18 hand this 13th of April, 2018.

19
20
21 _____
22 LINDA RUSSELL, Texas CSR #2965

23 Expiration Date: 12/31/2018

TSG Reporting, Inc

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